

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES McLAUGHLIN and	:	CIVIL ACTION
FRANCISCO McLAUGHLIN	:	
Plaintiffs	:	
	:	
vs.	:	
	:	
DAVID WILLIAMS and	:	
C. R. ENGLAND, INC.	:	
Defendants	:	NO. 02-CV-2996

PLAINTIFFS' REPLY TO SEPARATE DEFENSES
OF DEFENDANT, C. R. ENGLAND, INC.

Plaintiffs, James McLaughlin and Francisco McLaughlin, hereby respond to the Separate Defenses of Defendant, C. R. England, Inc., as follows:

FIRST SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s First Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

SECOND SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Second Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

THIRD SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Third Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

FOURTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Fourth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

FIFTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Fifth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

SIXTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Sixth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

SEVENTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Seventh Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

EIGHTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Eighth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

NINTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Ninth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

TENTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Tenth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

ELEVENTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Eleventh Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

TWELFTH SEPARATE DEFENSE

Denied. The allegations contained in Defendant, C. R. England, Inc.'s Twelfth Separate Defense are specifically denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Plaintiffs, James McLaughlin and Francisco McLaughlin, hereby demand that the Affirmative Defenses of Defendant, C. R. England, Inc., be dismissed and that judgment be entered in favor of Plaintiffs.

STEPHEN W. BRUCCOLERI, ESQUIRE
Identification No. 32334
Attorney for Plaintiffs
Eight Penn Center, Suite 1900
1628 John F. Kennedy Boulevard
Philadelphia, PA 19103
(215) 563-4440

Date: August 22, 2002

CERTIFICATION OF SERVICE

Stephen W. Bruccoleri, Esquire hereby certifies that he has served a true and correct copy of the within pleading upon all counsel of record on the date below via U.S. Mail, postage prepaid.

Date: August 22, 2002

STEPHEN W. BRUCCOLERI, ESQUIRE
Attorney for Plaintiffs